

REMARKS

This amendment is made for purpose of placing the application in better condition for allowance. No new issues are presented.

The specification has been carefully reviewed and amended as necessary to correct multiple spelling and grammatical errors. No new matter is introduced by this amendment.

By this amendment Figure 1 was corrected in order to eliminate a typographical error and unnecessary arrow head near block S1. Specifically, in block S10 of the flow-chart shown in Figure 1 the word "definitely" was misspelled. This paper is accompanied by a marked-up in red copy of Figure 1, labeled "Annotated Sheet Showing Changes" and a clean copy of corrected Figure 1 labeled "Replacement Sheet". The Examiner is respectfully requested to replace the originally filed Figure 1 with presently corrected.

Claims 7-14 are currently active in application. In order to highlight the distinguishable features of the present invention claims 1-6 have been canceled and new claims 7-14 have been presented for the Examiner's consideration. The Applicant respectfully submits that new claims are more narrow in scope and focused on the unique features of the present invention which are not shown by the prior art relied on by the Examiner. The new claims entirely based on the presented disclosure and at least on Figures 1-3 and page 7-9 of the specification. The Examiner is respectfully requested to consider added claims and allow the case. No new issues are presented by this amendment.

The present invention aims to simplify operation of inputting information in small-sized apparatus having a small display and limited number of the keys like a cellular telephone or a pocket computer. Applicant's apparatus allows to input unlimited length text, digital information or selected functions by pressing function-selecting keys or ten key. According to the invention, character or function assigned to each key can be viewed when user touches a key. Due to limited number of keys the several characters or functions are associated with each

key. For the reason that the display also is small in size the plurality of assigned characters are shown one by one in certain time interval when a user keeps touching the key. In order to enter selected character or function the user presses the touched key with pressure higher than the predetermined value when a necessary character or function is shown on the display screen. Therefore, the present invention allows to input information only watching display without seeing the keys. This gives an advantage to a user that characters can be inputted with higher efficiency using blind approach when a user does not need to see the keys.

More specifically, referring to Figure 1, the claimed apparatus distinguishes among three viewing scenes on display 2: a function-selecting scene S1, a number-selecting scene S2 or a character-inputting scene S3. The scenes are interchanged depending to which group of keys is touched by the user. A touching action allows to a user to view functions, numbers or characters associated with a particular key. The important feature of the present invention resides in the fact that a prolonged touch of any key initiates a successive and automatic show on a display all functions, numbers or characters assigned to the touched key one by one at a predetermined interval. If a user decides to input information displayed on the scene of the display 2 he or she just pushes down the key at pressure higher than the predetermined value.

In order to highlight all distinguishable features of the present invention new claims 7-14 have been proposed. Specifically, new claim 7 now recites, "A method for inputting function commands or number or character information to an apparatus having a display, one or more function keys and a limited number of information data input keys, said method comprising the steps of:

sensing an operation of said one or more function keys to display one of a function-selecting scene, a number-inputting scene or a character-inputting scene on said display;

sensing a user's finger touch of one of said data input keys and scrolling

through functions, numbers or characters assigned to the touched key for a function-selecting scene, a number-inputting scene or a character-inputting scene on said display,

sensing that the touched key has been pressed by a pressure exceeding a predetermined pressure,

selecting a currently displayed function, number or character displayed on said display when the touched key is pressed by a pressure exceeding said predetermined pressure, and

displaying the selected function, number or character on the display.”

(Emphasis added)

The new claim 8 introduces the unique scrolling function when a key is touched a scrolling through functions, numbers characters assigned to the touched key is activated on a display. The numbers, functions or characters assigned to the touched key is shown on a display successively and automatically one by one at a predetermined interval and the touched key is used to select a desired function, umber or character from the plurality of functions, numbers or characters by pressing it at a pressure exceeding a predetermined pressure.

Claims 1, 2, and 6 have been rejected under 35 U.S.C. §102(e) as being anticipated by Brisebois et al. (U.S. Patent 6,369,803). This rejection is respectfully traversed for the reason that Brisebois et al. fails to show the invention as presently claimed.

The reference to Brisebois et al. teaches an improved version of a touch-screen display. This invention resolves several problems of old implementation of interface devices with flexible touch areas located on display, which namely are: needs for a touch-screen templates which can be lost or damaged, and easy contamination of viewing display area due to frequent touch. In order to provide an improved user's interface Brisebois et al. proposes to place flexible touch areas not directly on display screen but adjacent to it. Specifically, a user interface in Brisebois et al. has an input device located adjacent an edge of the display and

operatively connected to the display to respond to a physical contact. According to Brisebois's et al. method, generating of an image on the display takes place in response to a human touch and a first pressure on the predetermined area. In order to implement selected function a second pressure is applied to the predetermined area of the input device.

As it can be seen from the above analyses, the present invention and reference belong to the different types of apparatuses, and if Brisebois et al. teaches an active edge input device with a user interface positioned on or adjacent to a display, the Applicant uses only a regular key pad and display in order to input information. It should be respectfully noted that in contrast to Brisebois et al. the Applicant's invention does not require additional keys for entering information. Furthermore, it should be noted that structurally the keys of Brisebois et al. comprise a flexible continuous strip or a number of sections of strip of material that extends around of display. In contrast, all keys used by Applicant are structurally isolated one from another.

Furthermore, during inputting of information the Applicant's invention clearly distinguishes among three display scenes: function-selecting scene, a number-inputting scene and a character-inputting scene. The reference to Brisebois et al. does not mention such feature.

Next, the plurality of functions associated with one key according to the Brisebois et al. will be shown all together on display during a touch action, when in the Applicant's apparatus all assigned to any particular characters or functions will be shown one after one within specified time interval.

In order to present the disclosed invention in more clear way claims 1 to 6 have been canceled and new claims 7 to 14 have been presented. As it can be seen, the new claims 7 to 14 highlight the following distinguishable features of the present invention which are not shown by the reference to Brisebois et al.:

"sensing an operation of one or more function keys to display one of a function-selecting scene, a number-inputting scene or a character-inputting scene

on said display;” (Claim 7)

“sensing a user’s finger touch of one of said data input keys and scrolling through functions, numbers or characters assigned to the touched key for a function-selecting scene, a number-inputting scene or a character-inputting scene on said display;” (Claim 7)

“the step of scrolling through functions, numbers or characters assigned to the touched key for a function-selecting scene, a number-inputting scene or a character-inputting scene on said display successively and automatically displays a plurality of functions, numbers or characters assigned to the touched key one by one at a predetermined interval and the touched key is used to select a desired function, number or character from the plurality of functions, numbers or characters assigned to the touched key”. (Claim 8)

MPEP §2131 mandates that “TO ANTICIPATE A CLAIM, THE REFERENCE MUST TEACH EVERY ELEMENT IN THE CLAIM”. Furthermore, the MPEP, citing *Richardson v. Suzuki Motor Co.*, USPQ2d §1051, §1053 (Fed. Cir. 1987), states “[t]he identical invention must be shown in as complete detail as is contained in the...claim” (emphasis added).

Here, none of the structural limitations highlighted in Applicant’s claims above are taught or suggested by Brisebois et al. It is therefore respectfully submitted that the rejections to the claims as currently presented are improper under 35 U.S.C. §102 as Brisebois et al. cannot anticipate the rejected claims since it does not “teach the identical invention”. Further, since the above limitations are not taught or suggested, Brisebois et al. cannot be used to support a *prima facie* obviousness rejection under 35 U.S.C. §103. Based on the above claim amendments and discussion with reference to the MPEP guidelines, it is respectfully requested that the rejections based on 35 U.S.C. §102 be withdrawn.

Claim 3 has been rejected under 35 U.S.C. §103(a) as being unpatentable over Brisebois et al. in view of Kraft et al. (U.S. Patent 6,487,424). This rejection is respectfully traversed for the reason that the combination of Brisebois et al. and

Kraft et al. fails to show the features of the claim 3.

Brisebois et al. has been distinguished above. The Examiner relies on the patent to Kraft et al. to show that display means successively displays plurality of characters or functions at predetermined interval. Specifically, the Examiner refers to Figure 8 and column 14, lines 51-52 and column 15, lines 3-4 at Kraft et al. as showing of function of displaying separately one by one a plurality of characters associated with one key at a certain time interval when the user continues to touch the key. However, the Examiner misunderstood the idea shown by the Kraft. The reference to Kraft et al. shows a different approach, wherein key 41 is a scroll key which allows a user to navigate through the list of characters by pressing key 41 a number of times in an upward or downward directions in order to select by a cursor a particular item, "The user may navigate through the candidate list by pressing the scroll key 41 in an upward/downward direction. ...When the desired character is highlighted, the user selects the character by pressing the soft key 40 with the functionality "Select". (Column 15, lines 3-9) It should be respectfully noted that the operation of selection of a chosen key is performed by the different key 40 "Select" (see Figure 8 in Kraft et al.) Additionally, Kraft et al. teaches a selection of a desired item from a list of characters fully presented on the display. In contrast, according to Applicant's invention all characters assigned to the one particular key "are successively and automatically displayed on the display 2 at a certain interval, when the user continues to touch the component key with his finger". (Page 11, lines 15-18 of the present specification) The same key is used for selection of a desired item by pressing it harder. In order to highlight distinguishable features of the present invention introduces new claims 7 to 14. The discussed above feature of scrolling in the present apparatus reflected in new claim 8. The Examiner is respectfully requested to consider new claim 8 and withdraw the rejections.

Claims 4-5 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Brisebois et al. in view of Waldman (U.S. Patent 5,311,175).

This rejection is respectfully traversed for the reason that the combination of Brisebois et al. and Waldman fails to show the invention as presently claimed.

The Examiner relies on the reference to Waldman mostly to show that the ten key is used for entering a numerals, which is a well known fact. The patent to Waldman is focused on the different sorts of identifying of keying information. It can be audible, visual or tactile information to a user regarding the identity, function, proper usage or potential utility of a given key or group of keys. However, even Waldman shows a visual identification of inputting information on the display, this reference, as well as all prior art relied on by the Examiner, is silent about showing the fact that during the prolonged touching of the specific key by a user's finger all assigned characters will be shown automatically one after another in certain interval of time, which is now presented in claim 8.

Summarizing the above discussion the Applicant respectfully submits that there are several claimed features of the present invention which are not shown by the prior art relied on by the Examiner, which namely are:

“sensing an operation of one or more function keys to display one of a function-selecting scene, a number-inputting scene or a character-inputting scene on said display”; (Claim 7)

“sensing a user's finger touch of one of said data input keys and scrolling through functions, numbers or characters assigned to the touched key for a function-selecting scene, a number-inputting scene or a character-inputting scene on said display”; (Claim 7)

“when a user's finger continuously touches any of key a display successively and automatically displays a plurality of characters and functions assigned to one particular key one after one at a predetermined interval of time”. (Claim 8)

In view of the foregoing, it is respectfully requested that the application be reconsidered, that claims 7 to 14 be allowed, and that the application be passed to issue.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

A provisional petition is hereby made for any extension of time necessary for the continued pendency during the life of this application. Please charge any fees for such provisional petition and any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041 (Whitham, Curtis & Christofferson, P.C.).

Respectfully submitted,



Olga V. Merkoulouva
Reg. No. 48,757

Whitham, Curtis & Christofferson, P.C.
11491 Sunset Hills Road, Suite 340
Reston, VA 20190
Tel. (703) 787-9400
Fax. (703) 787-7557
Customer No.: 30743